

# **EXHIBIT 4**

## Douglas Kress

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**From:** Douglas Kress  
**Sent:** Friday, January 24, 2014 4:46 PM  
**To:** 'Naveed Mahboobian'  
**Cc:** Larry Klayman  
**Subject:** RE: Klayman v. Judicial Watch

I have a problem with the Taitz notice. I was told that the deposition would be on the 31<sup>st</sup>. The notice says the 30<sup>th</sup>. I bought a plane ticket to fly Thursday morning. I thought Thursday was meant to a travel day. Please let me know. I could possibly do Taitz's deposition later in the day on Thursday.

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**From:** Naveed Mahboobian [<mailto:nmahboobian@gmail.com>]  
**Sent:** Friday, January 24, 2014 4:05 PM  
**To:** Douglas Kress  
**Cc:** Larry Klayman  
**Subject:** Klayman v. Judicial Watch

Mr. Kress:

Please find the attached Notice of Deposition for both Dr. Taitz and Ms. Ruffley. In addition, please also find Plaintiff's responses to Defendant's Request for Admissions.

Thank you,

Naveed

on behalf of Larry Klayman